

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

In Re:  Generations on 1st, LLC,  Debtor.	Case No.: 25-30002  Chapter 11  (Main Case)
In Re:  Parkside Place, LLC,  Debtor.	Case No.: 25-30003  Chapter 11  (Jointly Administered)

**DECLARATION OF ERICA SCHMITT (LIMOGES CONSTRUCTION, INC.)  
CERTIFYING RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE  
902(11)**

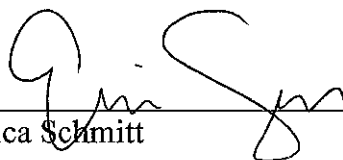
STATE OF SOUTH DAKOTA     )  
  ) SS  
  
COUNTY OF MINNEHAHA     )

Erica Schmitt, pursuant to 28 U.S.C. § 1746, hereby certifies as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Certification. The evidence set out in this Certification is based on my personal knowledge.
2. I am the Controller of Limoges Construction, Inc. ("Limoges") located in Sioux Falls, South Dakota and have been employed by Limoges since 2012. Limoges provides concrete construction services including building layout, concrete flatwork, rebar fabrication, and construction of foundations.
3. I am the records custodian for Limoges.
4. Limoges was subpoenaed for records in the lawsuit *Red River State Bank v. The Ruins, LLC, et. al.*, Codington County Circuit Court, South Dakota, Case No. 14CIV24-68. Limoges responded to the subpoena and provided documents as requested.

5. Limoges provided concrete construction services for the 63-unit mid/high rise building located at 315 East Kemp Ave., Watertown, South Dakota (the "Ruins Project").
6. Limoges provided concrete construction services for the mixed-use building located at 26 1<sup>st</sup> Ave. SW, Watertown, South Dakota (the "Generations Project").
7. Limoges provided concrete construction services for the Parkside Place apartment building located at 8 2<sup>nd</sup> St NE, Watertown, South Dakota (the "Parkside Project").
8. Limoges provided concrete construction services for the mixed-use building located at 10 N. Broadway, Watertown, South Dakota (the "Lofts Project").
9. True and correct copies of Limoges's Proposal, Invoices (102845, 102865, 102874, 102921, 102991, 103006), Payment Applications 1-6, and corresponding lien waivers and payment records for the Ruins Project are attached as Exhibit A.
10. True and correct copies of Limoges's Construction Agreement and Proposal, Invoices (7804, 7819, 7825, 7868, 7896, 102835, 102848, 102864, 102899), Payment Applications 1-8, and corresponding lien waivers and payment records for the Generations Project are attached as Exhibit B.
11. True and correct copies of Limoges's Construction Agreement, Proposal and Change Orders, Invoices (7735, 7782, 7801, 7845, 7897, and 7994), Payment Applications 1-5, and corresponding lien waivers and payment records for the Parkside Project are attached as Exhibit C.
12. True and correct copies of Limoges's Construction Agreement, Proposal and Change Orders, Invoices (7516, 7540, 7554, 7576, 7604, 7618, 7633, 7653, 7672, 7687, 7813), Payment Applications 1-11, and corresponding lien waivers and payment records for the Lofts Project are attached as Exhibit D.
13. The documents attached as Exhibits A (Ruins), B (Generations), C (Parkside), and D (Lofts) were made at or near the time of the events set forth therein by myself and other people with knowledge of those matters.
14. It was the regular practice of Limoges's business activities to make the records and/or to keep copies from information transmitted by attached as Exhibits A, B, C, and D.
15. The records attached as Exhibits A, B, C, and D were kept in the regular course of business activity.
16. I certify under penalty of perjury that the foregoing is true and correct.

Executed on 16<sup>th</sup> day of October, 2025.

  
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Erica Schmitt